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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MICHAEL EDISON,)
a/k/a Michael J. Edison, and)
DEBRA EDISON,)
a/k/a Debra Legum-Edison,)
a/k/a Debra Sue Legum-Edison,)
Defendants.)

Criminal No. CR 07-0074 WHA

**STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME**

The above-captioned matter came before the Court on September 23, 2008. The defendant, MICHAEL EDISON, was represented by Richard Mazer, Esq., defendant, DEBRA EDISON, was represented by Geoffrey Hansen, Esq., and the government was represented by Jeffrey Finigan and Tina Hua, Assistant United States Attorneys. The trial was continued from October 24, 2008, to January 5, 2009.

STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME
CR 07-0074 WHA

The Court made a finding that the time from and including September 23, 2008, through and including January 5, 2009, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best interest of the public and the defendant in a speedy trial. The finding was based on the need for the defendants to have reasonable time necessary for effective preparation and for continuity of counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

The parties hereby agree to and request that the exclusion of time until January 5, 2009, be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A), because the ends of justice served by this continuance outweigh the best interest of the public and the defendants in a speedy trial. This time exclusion will allow defense counsel to effectively prepare, taking into account the exercise of due diligence, and will provide for continuity of counsel for the defendants.

DATED: September 24, 2008

/s/
RICHARD MAZER
Counsel for Michael Edison

DATED: September 25, 2008

/s/
GEOFFREY HANSEN
Counsel for Debra Edison

DATED: September 25, 2008

/s/
JEFFREY R. KINIGAN
Assistant U.S. Attorney

So ordered.

DATED: September 26, 2008

WILLIAM H. ALSUP
UNITED STATES DISTRICT COURT JUDGE

